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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KONECRANES GLOBAL
CORPORATION,

Plaintiff,

vs.

MODE TECH (Beijing) Co., Ltd.,

Defendant.

Case No.: 2:18-cv-02015-GMN-NJK

**STIPULATION AND ORDER REGARDING
CLAIM CONSTRUCTION TUTORIAL
AND HEARING MATTERS**

(First Request)

Plaintiff Konecranes Global Corporation (“Konecranes”) and Defendant Mode Tech (Beijing) Co., Ltd. (“Mode Tech” and together, the “Parties”) stipulate, agree and respectfully request a six-week continuance of the Patent Tutorial and Claim Construction hearings scheduled for April 10 and April 17, 2020 (ECF No. 94), respectively, due to the travel-related concerns of lead counsel for the Parties as they are non-Nevada residents. Specifically, in light of current travel recommendations issued by the Centers for Disease Control and Prevention related to the coronavirus (COVID-19), the Parties’ respective lead counsel discussed and agreed to an approximate six-week continuance of the hearings, subject to the Court’s availability. This is the Parties’ first request related to the Patent Tutorial and Claim

1 Construction hearings.

2 Relatedly, the Parties have agreed and respectfully request that the Claim Construction
3 Responsive and Reply Briefs be extended by approximately one month to allow the deposition
4 of Konecranes' expert Emil Geiger to be re-scheduled from March 16, 2020 to April 8, 2020 for
5 the same travel-related concerns.¹ Specifically, the Parties have agreed to extend Mode Tech's
6 deadline to file its Claim Construction Responsive Brief from March 23, 2020 to April 22, 2020
7 and Konecranes' deadline to file its Claim Construction Reply Brief from March 30, 2020 to
8 April 29, 2020.²

9 Accordingly, the Parties respectfully request that the Court grant this Stipulation and
10 continue the Patent Tutorial and Claim Construction hearings for approximately six weeks to a

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26 ¹ Mr. Geiger's deposition is scheduled to take place in Reno, Nevada.

27 ² The Parties have previously sought four extensions of the Discovery Plan and Scheduling
28 Order. *See e.g.* ECF No. 93.

date convenient to the Court and extend the deadlines for the Claim Construction Responsive Brief to April 22, 2020 and the Claim Construction Reply Brief to April 29, 2020.

DATED this 11th day of March, 2020.

McDONALD CARANO LLP

BUETHER JOE & CARPENTER, LLC

By: /s/ Kristen T. Gallagher

By: /s/ Kenneth P. Kula

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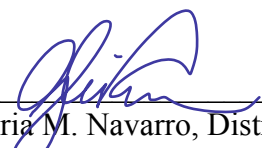
Attorneys for Konecranes Global Corporation

Attorneys for Mode Tech (Beijing) Co., Ltd.

IT IS SO ORDERED.

IT IS FURTHER ORDERED that the Tutorial and Claim Construction Hearing shall be continued to July 10, 2020 at 9:30 a.m. and July 17, 2020 at 9:30 a.m., respectively.

Dated this 11 day of March, 2020.


Gloria M. Navarro, District Judge
United States District Court